

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION  
CORPORATION,**

Plaintiff-Applicant,  
v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**STATUS REPORT FOR THE AVOIDANCE ACTION  
OMNIBUS HEARING SCHEDULED FOR NOVEMBER 18, 2015**

On November 10, 2010, this Court entered the order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141].

Pursuant to the Order, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, is required to file a report prior to each Avoidance Action Omnibus Hearing (as defined in the Order) setting forth the status of each of the avoidance actions that are subject to the Order and the procedures therein, and are scheduled to be heard at such hearing. Order Ex. A, ¶ 6D.

As of the date of this Notice, the avoidance action as set forth on the attached Appendix A is scheduled to be heard at the Avoidance Action Omnibus Hearing on November 18, 2015 at 10:00 a.m.

The next Avoidance Action Omnibus Hearing is scheduled for **December 16, 2015 at 10:00 a.m.** The Trustee will file a report of the status of each of the avoidance actions scheduled to be heard at such hearing as required by the Order.

Dated: November 11, 2015  
New York, New York

By: /s/ Nicholas J. Cremona  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**APPENDIX A**

1. 10-04425; Picard v. Manuel O. Jaffe
  - a. Notice of Presentment of an Order Granting Application to Withdraw as Counsel filed by Helen Davis Chaitman (Filed: 9/4/2015) [Docket No. 50]
  - b. Objection of Irving H. Picard, Trustee, to Notice of Presentment of an Order Granting Application to Withdraw as Counsel, and Accompanying Declaration of Helen Davis Chaitman (Filed: 9/8/2015) [Docket No. 51]
  - c. Notice of Hearing Regarding the Notice of Presentment of an Order Granting Application to Withdraw as Counsel (Filed: 11/4/2015) [Docket No. 53]